

**STATE OF DELAWARE  
APPLICATION FOR RENEWAL OF  
STATE CERTIFICATION  
FOR TELECOMMUNICATIONS RELAY SERVICES (TRS)**

**SEPTEMBER 28, 2007**

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Exhibit A - Verizon Delaware LLC. TELECOMMUNICATIONS RELAY SERVICE  
tariff - P.S.C. No. 1 –Section 1E

Exhibit B - Delaware Public Service Commission Order 3483, Exhibit “B” Delaware  
TRS Regulations – September 29, 1992

Exhibit C - Request for Quotation (RFP) No R0502659, Telecommunications Relay  
Services for the State of Delaware – August 16, 2005

Exhibit D - Sprint TRS and STS Training Outlines

Exhibit E - TRS Pledge of Confidentiality

Exhibit F - Sprint Standard Features Matrix

Exhibit G - June 28, 2007 Complaint Log, submitted to the Federal Communications  
Commission

**STATE OF DELAWARE'S  
APPLICATION FOR RENEWAL OF STATE CERTIFICATION  
FOR TELECOMMUNICATIONS RELAY SERVICES (TRS)**

**INTRODUCTION**

This narrative description of the Telecommunications Relay Service, available to the citizens of the State of Delaware ("State"), is submitted to the Federal Communications Commission ("FCC") as the application for renewal of the certified state Telecommunications Relay Services ("TRS") program.

A Telecommunications Relay Service was established to serve the State of Delaware on January 1, 1991. It has operated continuously since then to provide the citizens of the State who have a hearing or speech disability with 24-hour, 7-day per week access to facilities which permit them to communicate with those who do not have such a disability, and vice versa. On September 30, 1992, the State applied for initial certification of this TRS to the FCC. Certification was granted by the FCC on July 26, 1993. The Delaware TRS program was recertified for the first time on July 26, 1998 for an additional five years ending July 26, 2003. It was recertified again on July 26, 2003 for an additional five years ending on July 27, 2008. On June 22, 2007, the FCC gave public notice that it would accept renewals of state TRS program certifications from July 26, 2007 to October 1, 2002. This renewal application has been prepared in response to that notice.

**BACKGROUND**

On July 6, 1989, the Governor of the State of Delaware signed into law the provisions of 26 Del. C. § 220, which, among other items, directed the Delaware Public Service Commission ("DPSC") to require a public utility supplying local exchange telephone service<sup>1</sup> to provide a statewide Telecommunications Relay Service.

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<sup>1</sup> At that time, the Diamond State Telephone Company was the sole provider of local exchange service in the State of Delaware. Since then Diamond State Telephone Company's name was changed to Bell Atlantic-Delaware, Inc. ("BA-Del"), then to Verizon Delaware Inc. In November 2006, Verizon Delaware Inc. changed its name to Verizon Delaware LLC. ("Verizon")

The DPSC initiated proceedings to consider rules and regulations, and a funding mechanism for the provision of TRS in Delaware. At that time the Diamond State Telephone Company ("DST") prepared a Request for Proposal for the provision of TRS. The responding bids were reviewed by a Bid Review Committee established by the Governor. AT&T was the winning bidder and, in September 1990, DST signed a contract to have AT&T establish TRS in Delaware beginning January 1, 1991. Concurrently, an Advisory Committee was established by the Governor to provide advice to DST and AT&T regarding matters related to TRS customer service and overall

effectiveness. This Advisory Committee was thereafter formally established by legislation effective July 10, 1991.<sup>2</sup>

Since 1991, TRS has been provided to the citizens of Delaware under tariffs filed with the DPSC by Verizon. AT&T contracted with Verizon to provide this service from 1991 to December 31, 2005. When AT&T notified the Commission and Verizon in early 2005 that they would not seek renewal of their TRS contract a new provider was solicited through a Request for Proposal (“RFP”) issued in August 2005. Sprint was the successful bidder and began providing TRS service to Delaware citizens on January 1, 2006 with a seamless transition from AT&T, the previous TRS provider

TRS relay service is available by dialing 711 inside the state and through the following toll-free numbers:

1-800-232-5460 (Text Telephone, or TTY),  
1-800-232-5470 (voice only),  
1-877.DEL.RLY0 (877.335.7590) Voice Carry-Over (VCO)  
1-877.DEL.RLY5 (877.335.7595) Spanish  
1-877.DEL.RLY9 (877.335.7599) French  
1-877.DEL.S2S4 (877.335.7274) Speech-to-Speech (STS)  
1-900.468.2525 - 900 Access Number

A copy of the current applicable Verizon tariff –P.S.C. No. 1 –Section 1E is attached as Exhibit "A" of this application.

On September 29, 1992, the DPSC entered Order No. 3483 which adopted revised regulations to govern the provision of TRS service in light of the passage of the American with Disabilities Act of 1990 and the implementing regulations of the Federal Communications Commission. These Delaware regulations are attached as Exhibit "B".

The current contract with Sprint has been in effect since January 1, 2006 and will continue in effect until December 31, 2008. See Exhibit “C” – Request for Proposal (RFP) No. R0502659 Telecommunications Relay Services for the State of Delaware.

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<sup>2</sup> See 26 Del. C. § 221.

## **CERTIFICATION REQUIREMENTS**

### **STANDARDS**

#### **OPERATIONAL STANDARDS**

##### **A.1 Communication Assistants (CAs)**

***§64.604 (a)(1) (i) TRS Providers are responsible for requiring that all CAs be sufficiently trained to effectively meet the specialized communication needs of individuals with hearing and speech disabilities***

##### **CA Employment Standards**

Sprint has established a successful procedure to attract qualified applicants for TRS Communications Assistant (“CA”) positions. The first step in the CA’s hiring practice is a validated test that screens for typing, language skills, and other skills related to the CA position. When an applicant passes the test, a Human Resources representative screens the applicant over the phone or in person, for oral communication skills and work availability. If the applicant passes this step, he/she is interviewed in person by an Operations Supervisor for specific job dimensions that relate to the success of a CA. If the supervisor recommends the applicant for employment, the applicant undergoes a drug screen and security/reference check. This process ensures that only qualified applicants are hired to work at a relay center.

For more information about qualifications and training expectations, see Sprint’s TRS and STS Training Outlines - Exhibit D.

***§64.604 (a)(1)(ii) CAs must have competent skills in typing, grammar, spelling, interpretation of typewritten ASL, and familiarity with hearing and speech disability cultures, languages and etiquette. CAs must possess clear and articulate voice communications.***

##### **Communication Assistants Training Program**

Newly hired Sprint CAs receive training in Deaf Culture, American Sign Language (“ASL”) translation, the needs of non-signing deaf individuals, and sensitivity to the needs of persons with hearing and speech disabilities by a qualified person who, if not deaf or hard of hearing, possesses extensive knowledge in this area. During the CA’s initial training, they are trained and evaluated on how to accurately reflect the TTY user’s communication and on

the CA's role in the relay process. CAs' performance based skills such as grammar; spelling and oral communication abilities are evaluated. Sprint works closely with local deaf and hard of hearing communities to identify knowledgeable presenters to assist with the training. Sprint utilizes videos, role-playing, group activities and discussion groups to educate employees on the different needs of their customers to ensure sensitivity towards customers.

Additionally, applicants are given written and hands-on evaluations to demonstrate their ability to spell and type accurately, process a call using live training terminals, and role-play in varying levels of ASL. CAs also receive extensive training on how to improve their interpersonal skills so that they can work effectively with difficult and stressful situations that may arise during their employment.

A team of ASL-fluent Sprint employees developed the ASL Training workbooks that are utilized by CAs for ongoing training. These workbooks have been designed to provide supplemental training and to assist CAs toward the mastery of ASL translation on relay calls.

For more information on CA training requirements, see Sprint TRS and STS Training Outlines – Exhibit D.

#### CA Quality Assurance Programs

##### *Monthly Surveys*

Sprint Relay conducts monthly surveys and formal reviews to monitor and evaluate the continuing training for Sprint Relay TRS CAs. The survey process used is a product of a task force comprised of management staff. It evaluates all areas of work performance, personal effectiveness and attendance. The survey process goals are to respond to customer feedback and provide the CA with clearly defined and objective performance measures. Two surveys are completed on each CA every month and include areas such as Typing Accuracy, Spelling, Conversational English/ASL Translation, Clarity / Enunciation, Caller Control, and Etiquette/Composure.

##### *Quality Assurance Test Calls*

To ensure that all CAs are focused on FCC requirements and state contractual commitments, Sprint centers and or an independent third party quality testing firm has been retained by Sprint to perform a total of 700 test calls. Results are provided on a quarterly basis. Feedback and appropriate guiding performance measures for specific components are addressed with each CA.

##### *Relay Program Management and Trainer Test Calls*

Additionally, the Operations department and members of the Relay Program Management Team identify areas of concern based on customer feedback, state feedback, individual survey results and customer contacts. Approximately 300 test calls per month are conducted focusing on the identified monthly call-processing topic. Results are compiled and shared with Operations' management. Based on the results, the trainers and management determine if refresher training is required and what method will be used for delivery.

***§64.604 (a)(1)(iii) CAs must provide a typing speed of a minimum of 60 words per minute. Technological aids may be used to reach the required typing speed. Providers must give oral-to-type tests of CA speed.***

#### Transmission of 60 WPM

All Sprint Relay CAs type a minimum of 60 words per minute (WPM). Sprint Relay utilizes an oral-to-type test that simulates actual working conditions. CAs are tested on an ongoing basis to ensure that a 60 WPM performance requirement is maintained. During this test, Sprint Relay does not use technology-aided transmission to ensure the typing speed. The scores for each CA are the actual words per minute that are typed. The most recent test results were an overall 82.5 WPM with 97% accuracy for all call centers.

Sprint Relay utilizes technological aides during actual relaying such as pre-programmed macros and auto-correcting software, along with the CA's natural skill, to provide optimal service.

***§64.604 (a)(1) (v) CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of ten minutes. CAs answering and placing an STS call must stay with the call for a minimum of fifteen minutes.***

#### In-Call Replacement of CAs

Sprint Relay requires all CAs to stay on the call for a minimum of 10 minutes, with the exception of Speech to Speech (STS) CAs, who must stay on the call for a minimum of 15 minutes. This is included in the CA training matrix under Appendix D, Module 4I.

***§64.604 (a)(1)(vi) TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.***

When a Sprint relay user requests a CA of the opposite gender of the CA who initially receives the call, the relay user is switched to an appropriate CA as soon as one becomes available. If a change of CA is necessary during the call, every attempt will be made to accommodate the previous gender request.



*§64.604(a)(1)(vii) TRS shall transmit conversations between TTY and voice callers in real time.*

Sprint CAs transmit and relay all conversations between the caller and the called parties in real time.

#### A.2 Confidentiality and Conversation Context

*§64.604 (2)(i) Except as authorized by section 705 of the Communications Act, 47 U.S.C. 605, CAs are prohibited from disclosing the content of any relayed conversation regardless of content, and with a limited exception for STS CAs, from keeping records of the content of any conversation beyond the duration of a call, even if to do so would be inconsistent with state or local law. STS CAs may retain information from a particular call in order to facilitate the completion of consecutive calls, at the request of the user. The caller may request the STS CA to retain such information, or the CA may ask the caller if he wants the CA to repeat the same information during subsequent calls. The CA may retain the information only for as long as it takes to complete the subsequent calls.*

#### Confidentiality Policies and Procedures

Sprint Relay believes that measures to ensure confidentiality are crucial to the success of TRS, Sprint has implemented procedural and environmental measures to safeguard customer and call information.

In accordance with the FCC regulations, all information provided for the call set-up, including customer database records remain confidential and cannot be used for any other purpose. Once the inbound party disconnects, CAs lose the ability to view or access any information pertaining to that call. No written or taped information regarding the call is kept once the call is released from the Relay position. Billing information is transferred to billing files after the call has been terminated and is no longer available except for billing purposes.

The only exception to this policy relates to STS calls. Sprint STS Relay Agents may retain information from one inbound call for use in a subsequent outbound call, with the caller's permission. Such information will only be retained for the duration of the inbound call.

Sprint Relay's confidentiality expectations are strictly enforced and employees are expected to comply with this policy during and after their period of employment. Sprint strictly enforces confidentiality policies in the Center, which include the following:

- Prospective CAs undergo a thorough background investigation and screening.
- During initial training, CAs are presented with examples of potential breaches of confidentiality.
- Stress can be a factor in maintaining confidentiality. CAs receive training on healthy detachment.
- Breach of confidentiality will result in disciplinary action up to and including termination of employment.
- CAs perform their work in cubicles that are bordered by high sound-absorption acoustic tiles and wear special noise reducing headsets.
- All Sprint Relay Centers have security key access.
- Visitors are not allowed in Relay work areas.
- Supervisors are present in the work area to observe behavior.
- All Relay Center personnel are required to sign and abide by the Sprint Relay Center's Agreement Regarding Confidential Customer Information.
- All employees attend annual confidentiality meetings wherein the confidentiality agreement is reviewed and re-signed.

Sprint Relay Center's Agreement Regarding Confidential Customer Information requires CAs to:

- Keep all call information confidential.
- Not edit or omit any content from the conversation.
- Not add or interject anything into the content or spirit of the conversation.
- Assure maximum user control.
- Continuously improve their skills.

Please refer to Exhibit E for the TRS Pledge of Confidentiality.

#### STS Limited Exception of Retention of Information

At the request of a caller, Sprint Speech-to-Speech (STS) CAs will retain information from a call in order to facilitate the completion of consecutive calls. No information is kept after the inbound call is released from the CA position.

***§64.604 (2)(ii) CAs are prohibited from intentionally altering a relayed conversation and, to the extent that it is not inconsistent with federal, state or local law regarding use of telephone company facilities for illegal purposes, must relay all conversation verbatim unless the relay user specifically requests summarization, or if the user requests interpretation of an ASL call. An STS CA may facilitate the call of an STS user with a speech disability so long as the CA does not interfere with the independence of the user, the user maintains control of the conversation, and the user does not object. Appropriate measures must be taken by relay providers to ensure that confidentiality of VRS users is maintained.***

#### Verbatim Relay and the Translation of ASL

Sprint Relay CAs type to the TTY user or verbalize to the non-TTY user exactly what is said, verbatim, when the call is first answered, and at all times during the conversation, unless either relay user specifically requests summarization or ASL interpretation.

At the request of the relay user, Sprint Relay CAs will translate written ASL into conversational English. All Sprint Relay CAs are able to translate the typed languages of relay users whose primary language may be ASL or whose written English language skills are limited to conversational grammatically correct English. Training is provided on various levels of English/ASL during the initial training, as well as throughout a CAs' employment. In order to finish training successfully, the CA must demonstrate competent skills to translate the calls as requested.

### STS Facilitation of Communication

Sprint Relay STS CAs receive training on how to facilitate STS communication without interfering with the independence of the user. STS CAs are evaluated monthly on their ability to facilitate the call without altering content of the conversation or compromising the user's control. Sprint Relay users have full control of all of their relay calls.

#### **A.3 Types of Calls**

***§64.604 (3) (i) Consistent with the obligations of telecommunications carrier operators, CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.***

Sprint Relay provides 24 hour, 7 day-a-week Telecommunication Relay Service (TRS) for standard (voice), Text Telephone (TTY), wireless, or personal computers (PC) users to place local, intrastate, interstate, and international calls. Sprint Relay also processes calls to directory assistance and to toll free numbers. There are no restrictions on the duration or number of calls placed by any relay user. All relay users accessing Sprint Relay retain full control of the length and number of calls placed anytime through relay.

***§64.604 (3)(ii) Relay services shall be capable of handling any type of call normally provided by telecommunications carriers unless the Commission determines that it is not technologically feasible to do so. Relay service providers have the burden of proving the infeasibility of handling any type of call. (iii) Relay service providers are permitted to decline to complete a call because credit authorization is denied. (iv) Relay services shall be capable of handling pay-per-call calls.***

Sprint Relay works in conjunction with the Local Exchange Enhanced Services to provide additional functionality for users of TRS. Sprint processes collect and person-to-person calls and calls charged to a third-party as well as calls billed to prepaid and non-proprietary calling cards offered by the local or any other interexchange carrier. Sprint Relay will also process calls to or from restricted lines e.g. hotel rooms and pay telephones.

When a TRS call is placed through Sprint Relay, the user will be billed in the same manner that a non-relay user would be billed. The relay user will only be billed for conversation time, (which does not include call setup time, time in between calls and wrap-up time) on toll calls. Billing will occur within 60 days of the call date. Sprint gives users the option of billing their calls to a non-proprietary Local Exchange Carrier ("LEC") or Interexchange carrier ("IXC") calling cards. Sprint will process calling cards offered by the user's carrier of choice if the carrier is a participant of Sprint's Carrier of Choice ("COC") program and as long as Feature Group D is at the Carrier's access tandem. Sprint works with the LECs and IXCs to compile and make available to all TTY

users a list of acceptable calling cards. The user's carrier of choice is responsible for providing call types and available billing options, and will also handle the rating and invoicing of toll calls placed through the relay. Sprint was the first provider to process pay-per-calls, beginning with the state of Texas in 1996.

***§64.604 (3)(v) TRS providers are required to provide the following types of TRS calls: (1) Text-to-voice and voice-to-text; (2) VCO, two-line VCO, VCO-to-TTY, and VCO-to-VCO; (3) HCO, two-line HCO, HCO-to-TTY, HCO-to-HCO.***

Sprint Relay provides access to all available relay call types. A complete list of all call types proved by Sprint may be found in Appendix F Sprint TRS Standard Features Matrix. The requirement to provide 711 dialing is waived for outbound calls made from an STS or HCO user.

***§64.604(3)(vi) TRS providers are required to provide the following features: (1) Call release functionality; (2) speed dialing functionality; and (3) three-way calling functionality.***

#### Call Release Functionality

TTY-to-TTY Call Release Functionality allows the CA to connect two TTY users and then drop off the line, leaving the two TTY customers connected. This is especially useful for customers needing to use a pre-paid calling card, reach another TTY user through a switchboard or operator, or when the customer needs to speak with a voice user first.

#### Frequently Dialed Numbers

Frequently Dialed Numbers, sometimes referred to as Speed Dial Numbers, allow relay users to store up to 10 frequently called numbers in their customer preference database along with a name for each entry. When initiating a call the user can then provide the name to Sprint Relay CAs, instead of the entire 10-digit number.

#### Three-Way Calling

Customers who have purchased three-way calling from their LEC can use the feature when placing a call through Relay. This feature allows a customer to add a third party to a TRS call. For example, a TTY caller places a call to the Relay and then bridges another TTY person on his or her line. The original TTY caller then requests to place a call to a voice user. The CA will make the connection and Relay the call between the voice party and both TTY users. This process would also apply if there were two voice customers and one TTY user on the line.

***§64.604(3)(vii) Voice mail and interactive menus. CAs must alert the TRS user to the presence of a recorded message and interactive menu through a hot key on the CA's terminal. The hot key will send text from the CA to the consumer's TTY indicating that a recording or interactive menu has been encountered. Relay providers shall electronically capture recorded messages and retain them for the length of the call. Relay providers may not impose any charges for additional calls, which must be made by the relay user in order to complete calls involving recorded or interactive messages.***

When a Sprint Relay caller reaches an answering machine, voice mail or interactive menu, the CA informs the relay caller by hitting a macro which reads (ANS MACH) or (RECORDING) to keep the caller informed of the call progress. The CA then, if necessary, presses a hot key to record the voice announcement and relay the message back to the caller. The CA utilizes Sprint's recording technology to obtain all information necessary on the first attempt. The CA relays all of the recorded information to the customer and deletes the recorded message. This technology greatly reduces the CA work time, as the CA does not need to make multiple outdials. In addition, Sprint relay callers are only charged for the first call. Subsequent redials to leave a message or enter information into an interactive menu are not charged to the customers. Sprint has developed a procedure using their Ultra WATS lines to ensure that with additional out-dials the customer does not incur toll charges.

Callers to Sprint relay services access 900 services by dialing a free 900 number to access relay. Use of a toll-free 900 number inbound to the relay center provides functionally equivalent access to the telecommunications network while preventing unauthorized end users from circumnavigating the LEC restrictions. This process ensures that the LEC will only complete those calls into the relay service that do not have a 900 number block added to their phone lines. The 900 service provider and the 900 number carrier(s) will rate and bill the user as if the call was dialed directly from the originating user's telephone.

The current Delaware 900 number is (900) 468-2525.

***§64.604 (a) (3)(viii) TRS providers shall provide, as TRS features, answering machine and voice mail retrieval.***

Sprint Relay TRS provides both answering machine and voice mail retrieval. Please refer to Exhibit F- Sprint TRS Standard Features Matrix.

#### Answering Machine

Sprint Relay CAs will inform relay users when reaching an answering machine, voice mail or interactive menu. The CA will hit a "hot key" which reads (ANS MACH) or (RECORDING) to keep the caller informed of the call progress.

When reaching a recorded message, the CA utilizes Sprint's recording technology to obtain all information necessary on the first attempt. The CA can then play back the recording at a pace that allows them to relay the entire message to the caller, after which the recorded message is deleted. This technology greatly reduces the CA's work time and accordingly, the amount charged.

The CA will type the entire outgoing message verbatim including the option for the Relay User to leave a message, if applicable.

The CA will leave the relay user's message in the appropriate mode of communication. Sprint has the capability to leave messages in both voice, text and touch tones (pagers).

Once the CA has left the message on the answering machine or voice mail, the CA will send a pre-programmed response to the relay caller stating:

**(UR MSG LEFT) CA XXXXM/F GA**

Subsequent redials to leave a message or enter information into an interactive menu are not charged to the customers. Sprint has developed a procedure using their Ultra WATS lines to ensure that with additional outdials, the customer does not incur toll charges. Customers will only be charged for the first call.

#### Voicemail Retrieval

Sprint has the capability to retrieve messages from answering machines by placing an outbound call to a remote location or the same location. When a user requests to retrieve messages at the same location, the CA will instruct the user when to take the handset off the hook and when to begin playing back the messages. The CA will retrieve all messages and relay verbatim. The recorded message will be automatically deleted by the system once the relay call is completed.

#### **A.4 Handling of Emergency Calls**

***§64.604(a)(4) Handling of emergency calls. Providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point (PSAP). An appropriate PSAP is either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner.***

Sprint meets the requirements of emergency calls by immediately routing 911 calls to an appropriate Public Service Answering Point (PSAP) that the caller would have reached by dialing 911 directly, or a PSAP that is capable of dispatching emergency services in an expeditious manner. With one CA keystroke, Sprint's intelligent CA application utilizes the NPA/NXX information of the inbound caller to immediately cross-reference this information to a national database containing the ten-digit emergency number for every PSAP Center in Delaware. Within seconds, this number is entered in the dial window and the call is then immediately initiated.

Sprint Relay considers an emergency call to be one in which the user of the Relay Service indicates they need the police, fire department, paramedics or ambulance. Sprint utilizes a standard E911 database that serves all of the United States and has uniform procedures, as noted below, which are followed at every Sprint Relay Center.

- The CA, when told by a TTY/ASCII user (non-voice) that an emergency exists, will hit a hot key.
- The CA terminal will post a query containing the caller's ANI to the E911 database.
- The E911 database currently responds with the telephone number of an appropriate PSAP; automatically dials the PSAP number and passes the caller's ANI to the E911 Service Center.
- The CA will remain on the line and will verbally pass the caller's ANI to the E911 Service Center Operator.



Relay users will be encouraged to dial 911 as their primary means of contacting Emergency Services. However, if a Relay user makes an emergency call through Relay, the Sprint CA will make every effort to correctly route the call to an appropriate PSAP based on the network and user-provided information. As required by the FCC, CAs will remain on the line and give the Emergency Service Provider the caller's telephone number, even if the caller is no longer on the line.

It is Sprint's opinion that in some emergencies, valuable time could be lost if the TTY call were to be transferred to the PSAP, and the results could be life threatening. Therefore, Sprint will allow direct TTY-to-TTY communication in the following scenarios, if allowed by the FCC:

- At the request of the caller,
- At the request of the PSAP Operator or PSAP Supervisor,
- The CA will remain connected and will silently monitor the call, if:
  - (a) The PSAP is not capable of receiving and conversing directly with the caller in the modality of the caller (i.e. if the caller is using a communication modality other than TTY, [i.e., VCO, HCO, STS, or ASCII]), or
  - (b) The CA is having technical trouble transferring the call to the PSAP (i.e., the caller is disconnected from the PSAP; the PSAP cannot establish a TTY connection, etc.).

The CA will assist, as necessary, to maintain communications between the PSAP and the caller. Otherwise, the Sprint CA will remain on the line to provide assistance as necessary to facilitate communication for all emergency calls and will not disconnect until the call has been completed.

#### Telecommunications Service Priority Program

Sprint announced on October 31, 2005, that it had completed all milestones in enrolling its Telecommunications Relay Service (TRS) in the FCC's Telecommunications Service Priority (TSP) program. On May 11, 2005, Sprint began implementing TSP throughout its network. On October 31, Sprint successfully activated all 14 call centers under the TSP program. Sprint's participation in the TSP Program strengthens their already robust reliability.

In 1988, the TSP program was established to prioritize the restoration of telephone service to critical facilities and agencies at times when telecommunications companies are typically overburdened with service requests, such as after a natural disaster. In the event of a regional or national crisis, the program restores telephone services most critical to national and homeland security on a priority basis.

The Sprint TRS network is designed to reroute traffic to other Sprint Relay centers across the country to provide uninterrupted service. However, if a national or regional emergency causes service to be disrupted and the relay call center is unable to receive or place calls, Sprint's participation in the TSP program means that Local Exchange Carriers (LECs) are required to restore service to the relay call center as rapidly as possible consistent with the priority status assigned to the relay call center. Unlike other TRS providers, when a disaster occurs, Sprint TRS has the ability to reroute calls immediately to unaffected relay call centers and continue processing calls with minimal customer impact.

The Sprint relay call centers participating in TSP are:

- Albuquerque Switch (Albuquerque, NM and Honolulu, HI)
- Austin Switch (Austin, TX and Lubbock, TX)
- Dayton Switch (Dayton, OH and Cayce, SC)
- Independence Switch (Independence, MO)
- Jacksonville Switch (Jacksonville, FL)
- Lemoore Switch (Lemoore, CA)
- New Jersey Switch (Vineland, NJ)
- Sioux Falls Switch (Sioux Falls, SD and Moorhead, MN)
- Syracuse Switch (Syracuse, NY and Holyoke, MA)

The TSP program ensures that the Sprint relay call centers are placed on a priority basis to re-establish telephone service for Relay Delaware users.

#### **A.5 STS Called Numbers**

***§64.604 (a)(5) STS called numbers. Relay providers must offer STS users the option to maintain at the relay center a list of names and telephone numbers which the STS user calls. When the STS user requests one of these names, the CA must repeat the name and state the telephone number to the STS user. This information must be transferred to any new STS provider.***

Sprint's Relay customer database is available to Speech-to-Speech (STS) users. The database can be used to store a list of names, frequently dialed telephone numbers, and customer notes. The database automatically appears on the CA's terminal screen each time a user dials into one of the Sprint relay numbers. The customer database helps to facilitate call set up and conversing preferences for the STS user. Customer profile information contained in the Sprint Customer Database will be transferred to any new provider at the end of the contract term.

## **TECHNICAL STANDARDS**

### **B.1 ASCII AND BAUDOT**

***§64.604 (b) Technical standards—(1) ASCII and Baudot. TRS shall be capable of communicating with ASCII and Baudot format, at any speed generally in use.***

Each Sprint CA position is capable of receiving and transmitting in voice, Baudot including TurboCode™ and E-TurboCode™ as well as ASCII codes. Upon a call being received at the CA position, TTY signals are automatically identified as either Baudot or ASCII; if ASCII, the baud rate is detected. Intelligent modems allow the CA to handle either voice or data lines from the same CA work station.

This automatic identification of call types for incoming calls provides a quick and efficient technique for varied customer input and reduces the average CA work time to a minimum.

ASCII rates up to and including 19,200 bps are supported by the Sprint platform. The domestic TTY baud rate of 45.5 and the international rate of 50 baud are also supported.

### **B.2 Speed of Answer**

***§64.604 (2) Speed of answer. (i) TRS providers shall ensure adequate TRS facility staffing to provide callers with efficient access under projected calling volumes, so that the probability of a busy response due to CA unavailability shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.***

Sprint Relay has developed the capability to effectively manage a human resource pool to provide quality relay service. Sprint has gained valuable experience in sizing its TRS Operations to accommodate contract requirements. Historical call detail is gathered by 15-minute periods throughout the years of providing TRS service. This historical information is combined with state-specific information to establish anticipated call patterns that accurately predict the personnel needs necessary to efficiently process the relay calls.

Sprint meets the requirement of answering 85% of all calls within 10 seconds on a daily basis by a live CA. (Abandoned calls are included in this 85/10 Service Level calculation.) Sprint will ensure that no more than 30 seconds elapses between the receipt of the dialing information and the dialing of the requested number.

Sprint samples the average answer time a minimum of every 30 minutes for each 24-hour period. Sprint's Traffic Management Control Center (TMCC) and the Enhanced Services Operations Control Center (ESOCC) are staffed with professionals who understand call processes, call volumes, distribution

patterns, contract requirements and call routing, thus ensuring exemplary service.

The Sprint Centers that serve Delaware are provided with sufficient facilities to provide a Grade of Service (GOS) of P.01 or better for calls entering the Delaware call center switch equipment. Inbound calls that may be blocked within the Public Switched Telephone Network (PSTN) will receive a voice recording stating that all circuits are busy and to try the call again within a few minutes.

Performance of inbound traffic on each toll-free number where it enters the Sprint network is measured continuously and reported both daily and monthly. These measurements, which include traffic volume and blockage data, are compiled into a monthly report available to the State. In addition, the dedicated trunk facilities that route the call from the terminating network switch to the ACD (Automatic Call Distributor) at the serving relay center are monitored daily for compliance with blockage limitations. The data is monitored for both short- and long-term trends to ensure the most cost-effective use of resources.

***§64.604 (b) (2) ((ii) TRS facilities shall, except during network failure, answer 85% of all calls within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold. The ten seconds begins at the time the call is delivered to the TRS facility's network. A TRS facility shall ensure that adequate network facilities shall be used in conjunction with TRS so that under projected calling volume the probability of a busy response due to loop trunk congestion shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.***

Sprint has met the requirement of answering 85% of all calls within 10 seconds on a daily basis by a live CA. (Abandoned calls are included in this 85/10 Service Level calculation.) Sprint samples the average answer time a minimum of every 30 minutes for each 24-hour period. Sprint reports that the 2007 year-to-date monthly average through July for answering incoming calls within 10 seconds is 93.14%

Sprint Relay is committed to providing relay users with functionally equivalent telecommunication services as that enjoyed by standard telephone users. To this end, Sprint will continue to answer 85% of all relay calls within 10 seconds. The 10 seconds begins at the time the call is delivered to the Sprint Relay Center. There will be no more the 30 seconds of elapsed time between receipt of dialing information and the dialing of the requested number.

Sprint begins measuring speed-of-answer at the time the call hits the Relay switch. Calls are answered by a live CA and are not to be placed in a queue or on hold after reaching the Relay switch.

Sprint will ensure that adequate network facilities are available to avoid the possibility of a busy response due to loop trunk congestion.

***§64.604 (b) (ii) (A) The call is considered delivered when the TRS facility's equipment accepts the call from the local exchange carrier (LEC) and the public switched network actually delivers the call to the TRS facility.***

Sprint considers the call delivered when the Relay Center's equipment accepts the call from the LEC, and the public switched network actually delivers the call to the TRS Center.

Sprint furnishes the necessary telecommunications equipment facilities, and system software for the complete TRS operation. Sprint is a certified Interexchange Carrier (IXC) in all 50 states. Sprint's transmission circuits meet, and in most cases, exceed the ANSI T1.506-1990 Network Performance – Transmission Specifications for Switched Exchange Access Network standards.

***§64.604 (b) (ii) (B) Abandoned calls shall be included in the speed-of-answer calculation.***

Please see §64.604(b)(2)(ii) above.

***§64.604 (b) (ii) (C) A TRS provider's compliance with this rule shall be measured on a daily basis.***

Please see §64.604 (b)(2)(i) and (ii) above.

***§64.604 (b) (ii) (D) The system shall be designed to a P.01 standard.***

Sufficient transmission facilities have been provided to service all traffic levels, including busy hour peaks. Sprint utilizes trunks that are sized to provide a busy hour Grade of Service (GOS) of P.01 or a minimum of 99 out of 100 calls will have unrestricted and immediate access to the call center facilities during the busiest time of day.

Inbound calls that may be blocked within the Public Switched Telephone Network (PSTN) will receive a voice recording stating that all circuits are busy and to try the call again within a few minutes.

In addition, the dedicated trunk facilities that route the call from the terminating network switch to the ACD (Automatic Call Distributor) at the serving relay center are monitored daily for compliance with blockage limitations.

Sprint ensures no greater than 1% blockage on a daily basis. Sprint offers state Relay customers the advantages of a superior digital fiber network. Through use of leading switch technology and SONET network survivability techniques, Sprint's network ensures a very low level of call interruption or blockage.

The Sprint network switch architecture is non-hierarchical, that is, all switches are directly interconnected. Sprint switches are processor-controlled using advanced digital technology and are virtually non-blocking. A call across the Sprint network passes over Inter Machine Trunks (IMT) which are engineered at P.01 Grade of Service (GOS) at the busy hour to allow for maximum network call completion. The P.01 GOS requirements ensure that at least 99% of calls to the Relay Center will reach a CA. The Local Exchange Carrier (LEC) network typically utilizes a P.01 grade of service also, and similar blockage rates should apply on their facilities.

***§64.604 (b) (ii) (E) A LEC shall provide the call attempt rates and the rates of calls blocked between the LEC and the TRS facility to relay administrators and TRS providers upon request.***

Performance of inbound traffic on each toll-free number where it enters the Sprint network or relay center facility is measured continuously and reported both daily and monthly. These measurements, which include traffic volume and blockage data, are compiled into a monthly report available to the state.

### **B.3 Equal Access to Interexchange Carriers**

***§64.604 (b) (3) Equal access to interexchange carriers. TRS users shall have access to their chosen interexchange carrier through the TRS, and to all other operator services, to the same extent that such access is provided to voice users.***

Sprint provides Delaware callers with the ability to have their intrastate, interstate and international calls carried by any Interexchange carrier who has agreed to participate in the Delaware Carrier of Choice (COC) program. When a caller indicates their COC preference, the CA will verify that the requested carrier is a COC participant, if they are, the call will be routed accordingly. Callers will be able to use any billing method made available by the requested carrier including collect, third party, prepaid and calling cards.

The current participating members of Sprint Carrier of Choice program are:

AT&T Communications  
Bell South Long Distance  
Bestline  
Birch Telecom  
Broadwing Communications  
Broadwing Telecommunications  
Cox Communications

Excel Telecommunications, Inc.  
Global Crossings Telecommunications  
MCIWorldCom  
McLeod USA  
Qwest Communications  
SBC Communications Long Distance  
Souris River Telecommunications  
Sprint  
Telecomm\*USA (MCIWorldCom)  
Touch America Services, Inc.  
U.S. Link  
VarTec d/b/a Clear Choice Communications  
VarTec Telecom, Inc.  
Verizon Long Distance  
Winstar  
Working Assets  
WorldCom  
WorldXChange

If a Delaware caller does not indicate a COC preference to the CA either on-line or in their customer database (or if their preferred carrier is not a COC participant), the call will be carried over the Sprint network. As with calls carried by Sprint, most COC participants limit billing methods based on the type of line from which the call originates. When the requested carrier is not a COC participant, Sprint has established a procedure where the carrier will be notified, verbally and in writing, of its obligation to provide access to TRS users and encourage their participation.

#### **B.4 TRS Facilities**

***§64.604 (b)(4) TRS facilities. (i) TRS shall operate every day, 24 hours a day. Relay services that are not mandated by this Commission need not be provided every day, 24 hours a day.***

Sprint TRS and Sprint Relay Customer Service are both available 24 hours a day, every day of the year. Sprint utilizes both UPS and backup power generators to ensure that the relay centers have uninterrupted power even in the event of a power outage. UPS is used only long enough for the backup power generators to come on line – a matter of minutes. The backup power generators are supplied with sufficient fuel to maintain operations for at least 24 hours. The generators can stay in service for longer periods of time as long as fuel is available.

***§64.604 (b)(4) (ii) TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.***

Sprint's service is provided through an all-fiber sophisticated management control network that supports backbone networks with digital switching architecture. These elements are combined to provide a highly reliable, proven, and redundant network. Survivability is a mandatory objective of the Sprint network design. The Sprint network minimizes the adverse effect of service interruptions due to equipment failures or cable cuts, network overload conditions, or regional catastrophes.

Network survivability is the ability of the network to cope with random disruptions of facilities and/or demand overloads. Sprint has established an objective to provide 100 percent capability to reroute backbone traffic during any single cable cut. This is a significant benefit to Delaware, and a competitive differentiation of the Sprint network.

Sprint provides for the restoration of service in the event of equipment malfunctions, isolated network overloads, major network disruptions and national/civil emergency situations. In the event of service disruption due to Sprint's equipment, service typically is restored within four hours after notification. Sprint does everything possible to prevent a total outage at its switch sites or at any of its Points of Presence ("POPs") through the use of advanced site designs. All processors, memory, and switch networks within Sprint's switches are fully redundant. All switch sites are protected by uninterruptible power supplies and halon systems planned in conjunction with local fire departments.

### **B.5 Technology**

***§64.604 (b)(5) Technology. No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecommunications to person with disabilities. TRS facilities are permitted to use SS7 technology or any other type of similar technology to enhance the functional equivalency and quality of TRS. TRS facilities that utilize SS7 technology shall be subject to the Calling Party Telephone Number rules set forth at 47 CFR 64.1600 et seq.***

Sprint is in full compliance with 47 CFR §64.1600 et seq. of the FCC's Rules for providing SS7 capability.

In order to achieve functional equivalence, Sprint will continue to provide Caller ID service through SS7 signaling where the 10-digit number of the calling party is passed through to the called-party for local and long-distance calls. Sprint receives calling party identifying information including blocking information, from all Relay users. Sprint's Caller ID SS7 solution includes receiving the privacy bit information from the inbound Relay caller as well as other SS7 call information elements such as:



- Calling Party Number
- Charge Number
- Originating Line Information
- Sprint passes through the calling party information (rather than 711 or the number of the Relay Center)

### **B.6 Caller ID**

***§64.604 (b) (6) Caller ID. When a TRS facility is able to transmit any calling party identifying information to the public network, the TRS facility must pass through, to the called party, at least one of the following: the number of the TRS facility, 711, or the 10-digit number of the calling party.***

Sprint Relay offers a network-based Caller ID for all outbound calls which traverse over Sprint's Integrated Services Digital Network (ISDN) and SS7 with FGD network. This feature supports Caller ID for all local and long distance calls. In all cases in which it is received, Sprint forwards the calling party's ANI (Automatic Number ID) to the terminating Local Exchange Carrier ("LEC") for long-distance calls utilizing Sprint's Feature Group D trunks (FGD). As with standard telecommunications, the terminating LEC may or may not choose to use this ANI information as Caller ID information and pass this on to the terminating number. When passed through, the relay call recipient will be able to see the caller's phone number on their Caller ID display (the Caller ID option feature must first be purchased through their LEC). When not passed through, as with standard telecommunications, the call recipient will receive a message such as "OUT OF AREA" or "CALLER UNKNOWN."

## **FUNCTIONAL STANDARDS**

### **C.1 Consumer Complaint Logs**

***§64.604 (c)(1)(i) States and interstate providers must maintain a log of consumer complaints including all complaints about TRS in the state, whether filed with the TRS provider or the State, and must retain the log until the next application for certification is granted. The log shall include, at a minimum, the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution. (ii) Beginning July 1, 2002, states and TRS providers shall submit summaries of logs indicating the number of complaints received for the 12-month period ending May 31 to the Commission by July 1 of each year. Summaries of logs submitted to the Commission on July 1, 2001 shall indicate the number of complaints received from the date of OMB approval through May 31, 2001.***

Sprint maintains a log of each individual complaint and provides comprehensive reports on a monthly and annual basis to Verizon and the DPSC.

Additionally, by June 15th of each calendar year, Sprint submits a copy of 12-month complaint log report for the period of June 1- May 31 to the DPSC.

Beginning in July 2001, AT&T, the original TRS provider for the State of Delaware and Sprint, as the TRS provider from January 1, 2005 to the present, have complied with the requirement that complaint logs be maintained and summary reports be submitted to the FCC by July 1 of each year. As reported to the FCC on a yearly basis, the Delaware Public Service Commission has had no consumer complaints during the reporting periods: and therefore, has had no summary complaint logs to file with the FCC.

A copy of the most recent complaint log filing at the FCC, dated June 28, 2007, is attached as Exhibit G.

### **C.2 Contact Persons**

***§64.604 (c)(2) Contact persons. Beginning on June 30, 2000, State TRS Programs, interstate TRS providers, and TRS providers that have state contracts must submit to the Commission a contact person and/or office for TRS consumer information and complaints about a certified State TRS Program's provision of intrastate TRS, or, as appropriate, about the TRS provider's service. This submission must include, at a minimum, the following: (i) The name and address of the office that receives complaints, grievances, inquiries, and suggestions; (ii) Voice and TTY telephone numbers, fax number, e-mail address, and web address; and (iii) The physical address to which correspondence should be sent.***

The contact for consumer complaints for the State of Delaware is Verizon Delaware in contract with Sprint. Verizon's assigned expert for Delaware TRS is Julia Joyce. Sprint's assigned contact person is Karl Ewan, Sprint Relay, Delaware Relay Program Manager, 401 Ninth Street NW, Suite 400 North, Washington, DC 20004. Delaware Relay Voice Mail – 800.713.6327, e-mail: karl.a.ewan@sprint.com

Delaware TRS customer complaints can be registered with Sprint by fax at 1-877-877-3291 (Fax) and by email at sprint.trscustserv@sprint.com. Customers also have the option of calling the Sprint 24-hour Customer Service department (1-800-676-3777) or the Delaware Relay Program Manager to file complaints or commendations.

Verizon also offers a toll-free customer service number (1-800-974-6006) during business hours for customers with disabilities. Customers who dial this number are directed to the Relay Provider.

The DPSC Rules of Practice provide for the filing of both formal and informal complaints with the Commission. Informal complaints can be made by telephone, TTY, fax, or email. The Commission Regulations, attached as Exhibit "B", require that formal complaints will normally be addressed by Commission Order within 180 days from the filing of the complaint. Every reasonable effort is made by the Commission staff to affect an informal resolution of the complaints involving a public utility service, such as TRS, prior to the filing of formal written complaints.

### C.3 Public Access to Information

*§64.604 (3) Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions in telephone directories, through directory assistance services, and incorporation of TTY numbers in telephone directories, shall assure that callers in their service areas are aware of the availability and use of all forms of TRS. Efforts to educate the public about TRS should extend to all segments of the public, including individuals who are hard of hearing, speech disabled, and senior citizens as well as members of the general population. In addition, each common carrier providing telephone voice transmission services shall conduct, not later than October 1, 2001, ongoing education and outreach programs that publicize the availability of 711 access to TRS in a manner reasonably designed to reach the largest number of consumers possible.*

Information concerning TRS is published in all Verizon Delaware Directories. Verizon, Sprint Relay Services and the Delaware Public Service Commission also provide information on their websites. Sprint is developing a website specific to Delaware Relay. Sprint Relay representatives are available for community presentations. Sprint also encourages the use of relay services participating in various community activities, such as advocacy meetings, school presentations and other forums. Sprint is also an active member of the Delaware TRS Advisory Board.

See Exhibit "H" for attached public information samples.

### C.4 Rates

*§64.604 (4) Rates. TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination*

TRS users making relay calls, both local and toll (intraLATA) are billed at the same rate that would apply if the relay center were not involved in completing the call. Relay calls are billed at Verizon Delaware's applicable tariff or Guide rate or the competitive carrier's tariffed rate, or, for interLATA calls, the carrier's applicable tariff rate. TRS toll calls, carried by Verizon, are eligible for discounts as provided under Verizon Delaware LLC's Guide for Detariffed Services - Competitive, Section 27. Other carriers, as participants in Sprint's Carrier of Choice program, may also offer various discounts for TRS toll calls as provided in their tariffs.

### C.5 Jurisdictional Separation of Costs

*§64.604 (5) Jurisdictional separation of costs—(i) General. Where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set forth in the Commission's regulations adopted pursuant to section 410 of the Communications Act of 1934, as amended (ii) Cost recovery. Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism. Except as noted in this paragraph, costs caused by intrastate TRS shall be recovered from the intrastate jurisdiction. In a state that has a certified program under §64.605, the state agency providing TRS shall, through the state's regulatory agency, permit a common carrier to recover costs incurred in providing TRS by a method consistent with the requirements of this section.*

Delaware TRS costs are properly accounted for between interstate and intrastate jurisdictions. Sprint bills intrastate minutes to Verizon Delaware LLC. Verizon Delaware LLC considers TRS charges part of the cost of doing business. Verizon accounts for these TRS costs as part of their normal operating expenses and recovers these expenses across the rate structure. TRS funding is not a separate line item on the customer's bill for telephone service. Interstate minutes are submitted to the National Exchange Carriers Association (NECA) for reimbursement pursuant to FCC's Third TRS Report & Order dated July 20, 1993.

### C.6 Complaints

*§64.604 (6) (i) Referral of complaint. If a complaint to the Commission alleges a violation of this subpart with respect to intrastate TRS within a state and certification of the program of such state under §64.605 is in effect, the Commission shall refer such complaint to such state expeditiously. (ii) Intrastate complaints shall be resolved by the state within 180 days after the complaint is first filed with a state entity, regardless of whether it is filed with the state relay administrator, a state PUC, the relay provider, or with any other state entity.*

The Delaware Public Service Commission, Verizon Delaware LLC. and Sprint, the Delaware Relay contracted provider, comply with the TRS complaint procedures as provided for in §64.604 C.6. As explained above, in the section entitled Contact persons - §64.604 C.2, Sprint offers toll free numbers for voice, TTY and Fax complaints as well as an email option. In addition, Verizon provides a toll free number for customers with disabilities. Customers may also choose to contact the DPSC directly and file a complaint informally or formally as outlined in the Rules of Practice and the Delaware TRS Regulations attached as Exhibit “B”.

Sprint has a comprehensive Customer Complaint Tracking program. A supervisor or Operations Administrator is available 24 hours a day to accept complaints, document and forward documentation to the proper source for resolution. Supervisors provide immediate feedback to both the customer and the CA.

Sprint’s complaint resolution procedure ensures complaints are resolved within 180 days of filing. If the complaint concerns a specific CA, an Operations Supervisor follows up and resolves the complaint. If the complaint concerns a specific technical issue, a trouble ticket is filed and the ticket number is documented on the customer contact form. The ticket will be investigated and resolved by an on-site technician. The state-assigned Relay Program Manager is responsible for tracking all technical complaints and following-up with customers on resolutions. If a miscellaneous complaint is filed with customer service, a copy is faxed to the appropriate Relay Program Manager for resolution and follow-up with the customer.

As stated above, Delaware customers also have the option of calling Sprint’s 24-hour Customer Service department (1-800-676-3777) or the Delaware Relay Program Manager to file complaints or commendations.

#### **C.7 Treatment of TRS Customer Info**

***(7) Treatment of TRS customer information. Beginning on July 21, 2000, all future contracts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service provision. Such data may not be used for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Such information shall not be sold, distributed, shared or revealed in any other way by the relay center or its employees, unless compelled to do so by lawful order.***

The Sprint Customer Preference Database includes in the customer profile such items such as types of call, billing information, speed dialing, slow typing, carrier of choice, as well as emergency numbers, blocked outbound numbers,

language type (English, Spanish, ASL) and call notes. At the end of the ensuing contract(s) Sprint as the outgoing vendor shall provide for the transfer of TRS customer profile data from SPRINT to the incoming TRS vendor. Sprint will transfer all Delaware database records to the next incoming relay provider, at least 60 days prior to the last day of service, in a usable format. The use of such data will be restricted as directed by the FCC Federal TRS Regulations.

## **STATE CERTIFICATION**

*§64.605 (a) (1) Certified state program. Any state, through its office of the governor or other delegated executive office empowered to provide TRS, desiring to establish a state program under this section shall submit, not later than October 1, 1992, documentation to the Commission addressed to the Federal Communications Commission, Chief, Consumer & Governmental Affairs Bureau, TRS Certification Program, Washington, DC 20554, and captioned "TRS State Certification Application." All documentation shall be submitted in narrative form, shall clearly describe the state program for implementing intrastate TRS, and the procedures and remedies for enforcing any requirements imposed by the state program. The Commission shall give public notice of states filing for certification including notification in the Federal Register.*

## **ENFORCEMENT**

The DPSC Regulations relating to the provision of TRS are adopted by Commission Order, and compliance with such orders is enforceable under 26 Del. C. § 217 by the imposition of penalties of up to \$1000 per day.

## **NO CONFLICT WITH FEDERAL LAW**

The minimum standards as outlined in section §64.604 of the FCC Regulations for the Provision of Telecommunications Relay Services are the basis for the Delaware TRS program. Therefore, the Delaware TRS program, as provided, does not conflict with federal laws by imposing Delaware standards that exceed those mandated by the FCC.

## **STATE CERTIFICATION REQUEST**

Based upon the foregoing narrative description and the hereinabove described attachments, the Federal Communications Commission can, and should, determine that Delaware's approach to providing TRS service through the regulation of public utilities providing local exchange telephone service meets or exceeds all operational, technical, and functional minimum standards established by the Regulations of the FCC.

Furthermore, the FCC should determine that the documentation provided establishes that there are available procedures and remedies for enforcing the requirements of the DPSC concerning the provision of TRS, and that the Delaware program and its minimum standards for the provision of TRS in no way conflict with other federal laws.